

EXHIBIT 3
FILED UNDER SEAL

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC

Plaintiff,

vs.

Case No. 17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;

OTTOMOTTO, LLC; OTTO

TRUCKING LLC,

Defendants.

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

VIDEO DEPOSITION OF DANIEL GRUVER

San Francisco, California

Friday, August 4, 2017

Volume II

REPORTED BY:

REBECCA L. ROMANO, RPR, CSR No. 12546

JOB NO. 2671821

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1 materials. It is well made for [REDACTED]. 02:59

2 Q. I see.

3 How many other different materials did
4 you consider?

5 A. Well -- hm. Like did I -- probably -- 03:00

6 Q. I'm talking about actively considering.

7 A. Yeah, yeah. Probably three or four.

8 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] 03:01

1 Q. Okay. And you used that knowledge to 03:01
2 help design the [REDACTED] that we were talking about
3 here in March of 2016, didn't you?

4 A. Sorry. Repeat that?

5 [REDACTED] [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED] [REDACTED]

9 Q. Okay. When -- [REDACTED]
10 [REDACTED] that we are talking about -- 03:02

11 A. Yes.

12 Q. -- did you -- did you create that from
13 scratch or did you get it from another source?

14 A. Sorry. In which part?

15 Q. So I am referring to your initial [REDACTED] 03:02
16 lens design.

17 A. Uh-huh.

18 Q. The [REDACTED] you are not a
19 specialized optical engineer, right?

20 A. No. 03:03

21 Q. Where did you get the [REDACTED]
22 from?

23 A. So using an optimization function in
24 Zemax, it was based on sort of, I guess,
25 optimizing -- either minimizing or maximizing 03:03